

EXHIBIT C

Global Weather v. Joe Pags Media, et al. - Notice of Rule 12(b)(6) Motion and Right to Amend



From: James H Freeman
<jfreeman@sanderslaw.group>
Sent: Monday, August 12, 2024 4:32 PM
To: alockton@mchaleslavin.com; Craig Sanders <csanders@sanderslaw.group>
Cc: 'Litigation' <Litigation@McHaleSlavin.com>
Subject: Re: Global Weather v. Joe Pags Media, et al. - Notice of Rule 12(b)(6) Motion and Right to Amend

Counsel:

A copy of the Video was sent to you via Wetransfer. Kindly confirm receipt.

Also, keep in mind that the complaint filed as Clement v. IHeartmedia in WD.Texas will be amended to reflect that Global Weather Productions LLC, rather than Clement, is the copyright holder. Because defendant has yet to appear, we have not had opportunity to amend. So to the extent you intend to base a motion to dismiss the instant matter on the WD Texas case (even though we already provided you a copy of the executed copyright assignment agreement), defendant will be barking up the wrong tree.

Best,

James

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James H Freeman



To: alockton@mchaleslavin.com

Tue 8/13/2024 3:33 PM

Cc: Craig Sanders

We already provided you the copyright assignment agreement showing that Global Weather has standing in this case. We were simply notifying you that the WD Texas case was filed in error and will be amended to reflect that Clement assigned his rights to Global Weather.

Feel free to make whatever frivolous motion you like. The Court already denied your last wasteful motion and we remain confident the same result will obtain on your next motion. Meanwhile the plaintiff's fees are adding up and defendant is facing a presumptive entitlement to fees in 5th Circuit upon a finding of liability ...